



EUROPEAN FEDERATION OF THE TRADE IN DRIED FRUIT & EDIBLE NUTS • PROCESSED FRUIT & VEGETABLES • PROCESSED FISHERY PRODUCTS • SPICES • HONEY

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FRUCOM position paper on the consultation on the revision of food information to consumers

FRUCOM welcomes this public consultation and the opportunity to provide comments on the inception impact assessment related to the initiatives “Facilitating healthier food choices – establishing nutrient profiles” and “Food labelling - revision of rules on information provided to consumers”.

FRUCOM represents the interests of European traders in dried fruits, edible nuts, processed fruits & vegetables, and processed fishery products.

We embrace Commission’s proposal to set nutrient profiles and revise the rules on the information provided to the consumers.

Front-of-pack nutrition labelling – general considerations:

We agree that the variety of front-of-pack (FOP) schemes present on the EU market results in inequity in consumers’ access to information and could result in fragmentation of the internal market, costs for businesses having cross-border activities as well as consumer confusion and lack of trust. We support that any initiative that will be implemented should be at the EU level and therefore harmonized throughout all EU markets. These systems must be scientifically validated and follow a clear and transparent method. Any contradiction with the European or even national dietary recommendations should be avoided.

A holistic approach should be followed for FOP labelling and nutritional profile, taking into account the positive role of food and their role in a balanced diet. The roles of portions and occurrence are important for consumers’ information and support for balanced and varied diet. Moreover, these systems should permit a positive choice with a clear identification of foods and nutrients to encourage.

Regardless of which FOP scheme is implemented, emphasis should be given to the consumer education on the scheme used for it to be most impactful. For an effective action, this should be part of clear political & health initiatives including awareness of consumers.

Choice of option:

Some of our members are in favour of Nutri-score (option 4) and already use it, while others think that ‘Option 2: Nutrient-specific labels – colour-coded’, should be preferred.

Nutrient-specific labels - examples		Summary labels - examples	
Numerical (Option 1)	Colour-coded (Option 2)	Endorsement logos (Option 3)	Graded indicators (Option 4)



Some members are in favor of nutri-score (option 4), since this label has already been tested and implemented in some countries and by some companies. Nutri-score allows consumers to compare nutritional values of foods of the same category and leads to 'healthier' food compositions (sugar, salt, etc.) for such products where reformulation is possible. Nutri-score implementation has required financial, organisational and human resource investment for the companies which already use it.

Other members favor option 2 which is more objective. Among FRUCOM products is dried fruit, which is naturally high in sugar, and nuts, some being naturally high in fat, which are penalised by nutri-score. Being nutrient-specific, option 2 helps the consumer to understand which nutritional aspects of the product make it healthier or less healthy (e.g., sugar, fat, salt....) and how to balance their meal (e.g., if that food is high in sugar, avoid consuming other high sugar food in that meal/day). This approach may be more educative for consumers and may also help them to choose the products that best fit their dietary needs. Furthermore, this could give them the opportunity to understand the composition of the product they are buying, and it may be quicker and/or easier way than reading nutrition facts and ingredients list of the product. This is not possible using nutri-score: being a summary label, it is a general evaluative score.

Changes required in nutri-score:

The nutri-score algorithm needs to be changed not to penalize dried fruit and nuts. Furthermore, its calculation should be science-based and based on the serving size.

- In nutri-score the negative aspects of the product (e.g., saturated fats, sugars and salt) are attributed more points than the **positive aspects** (e.g., fibres, protein) and thus the latter weigh less in the score calculation. We are not in favour of such approach.
- Among FRUCOM products is **dried fruit**, which is naturally high in sugar and may be penalised by nutri-score. Although having a high sugar content, dried fruit is also included in the 400g/5 portion of fruit and vegetables a day recommended by WHO. It provides minerals, vitamins and fibres and has therefore a significant nutritional value. Naturally high in fat **nuts** should not be penalised.
- Nutri-score does not take into consideration the **serving of the product**, which is crucial, especially for certain foods such as dried fruit and nuts, which are nutritious but also energy dense and thus guidelines give specific indications regarding the recommended serving.
- Some of our members also signalled errors in the algorithm used in nutri-score. As a result, certain healthy products are regarded as unhealthy. For instance, we call for an **equivalence of freeze-dried fruits and vegetables** with fruits and vegetables dried by the application of heat. Freeze-drying is a particularly gentle drying process in which temperature-sensitive vitamins, such as vitamin C, are preserved. Freeze-drying is therefore nutritionally superior to conventional drying methods and there is no nutritional justification for excluding freeze-dried fruits and vegetables from the group of foods that positively affect nutri-score.
- Furthermore, **macadamia nut** kernels should be added to the nut list, because it belongs to the group of nuts botanically and is nutrient-rich just like other tree nuts.

Nutrient profiles:

FRUCOM also welcomes the introduction of nutrient profiles, to ensure transparency and to avoid misleading the consumers when they try to make healthy choices. However, as stated above, this should not penalise products containing natural sugars, such as dried fruit. Not allowing them to bear nutritional claim despite the fact that they comply with the claim regulation goes against current nutritional recommendations.



FRUCOM understands the importance of stimulating food reformulation towards healthier foods. Nevertheless, reformulation is not possible in certain cases, for instance when a minimally processed product contains naturally occurring sugars (e.g., dried fruit) or fat (e.g., nuts). Finally, some of FRUCOM products do not require by law to bear a nutrition declaration (e.g. nuts sold in bulk).

Origin labelling:

FRUCOM is in favour of a harmonized and voluntary origin labelling, to allow consumers to better identify the origin of food and to facilitate consumers' informed and sustainable food choices. Providing very detailed information for every stage of processing may be difficult. We support and online and cloud information for origin labelling in order to fit with packaging constraints (printings, colors, availabilities ..)

A choice should be left to businesses to indicate the origin of harvest and/or processing place of the product. Furthermore, mixed products could also raise problems, as the components may have different origins.

Date marking:

FRUCOM sees the need for an action regarding date marking. We support any changes to help consumers understand which foods do not have food safety concerns even after the date indicating a potential degradation in quality. The indication "use by" and "best before" is often misunderstood by the consumer. The latter, which refers to the date food retains its optimal quality, is the one FRUCOM products are marked with and is the most misinterpreted by the consumers. This misinterpretation causes huge food waste that could be prevented. In our view, 'Option 3: To improve the expression and presentation of date marking' is the most appropriate. FRUCOM is not in favour of mandatory place for date marking, as this would be difficult to implement.

Finally, FRUCOM would like to stress the importance of providing a transitional period and allowing the label stocks to be used up, to give the companies the time to align with the new regulation, avoiding the waste of products bearing a label which is not compliant anymore.

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